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*Co-Counsel for Debtors and
Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

BED BATH & BEYOND INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 23-13359 (VFP)

(Jointly Administered)

APPLICATION FOR ORDER SHORTENING TIME

TO THE HONORABLE VINCENT F. PAPALIA, UNITED STATES BANKRUPTCY JUDGE:

The above-captioned debtors and debtors in possession (collectively, the “Debtors”) by and through their undersigned counsel request that the time period to notice a hearing on the

¹ The last four digits of Debtor Bed Bath & Beyond Inc.’s tax identification number are 0488. A complete list of the Debtors in these Chapter 11 Cases and each such Debtor’s tax identification number may be obtained on the website of the Debtors’ claims and noticing agent at <https://restructuring.ra.kroll.com/bbby>. The location of Debtor Bed Bath & Beyond Inc.’s principal place of business and the Debtors’ service address in these Chapter 11 Cases is 650 Liberty Avenue, Union, New Jersey 07083.

Debtors' Motion for Entry of an Order (I) Approving the Settlement Agreement Between the Debtors and the Mexico JV Partner, (II) Authorizing the Debtors to Perform All of Their Obligations Thereunder, and (III) Granting Related Relief (the "Motion"),² as required by Fed. R. Bankr. P. 2002 be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1), and respectfully submit:

1. A shortened time hearing is requested because: Given the fast pace of these Chapter 11 Cases, the Debtors believe, in their business judgment, that authorizing the Debtors to enter into the Settlement Agreement (as defined in the Motion) is in the best interest of the estates. Prompt entry into the Settlement Agreement will allow the Debtors to avoid any unnecessary litigation, immediately recover the Settlement Payment (as defined in the Settlement Agreement) in the amount of \$850,000, and finalize the extensive negotiations between the Parties (as defined in the Motion). Accordingly, it is imperative that the Motion is heard as soon as practicable. The Debtors do not believe that any party will be prejudiced by the shortened notice for a hearing, and the Lenders have not objected to the proposed rejection.

2. State the hearing dates requested: The Debtors respectfully request that the Court hear the Motion at its earliest convenience.

3. Reduction of the time period is not prohibited under Fed. R. Bankr. P 9006(c)(1).

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

WHEREFORE, the Debtors respectfully request entry of the proposed order shortening time, in substantially the form submitted herewith, granting the relief requested herein and such other relief as is just and proper under the circumstances.

Dated: September 15, 2023

/s/ Michael D. Sirota

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